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March 16, 2018

**BY ECF**

Hon. Ronnie Abrams  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: *United States v. Jason Galanis, et al.*, S1 16 Cr. 371 (RA)**

Dear Judge Abrams:

I represent Devon Archer. I write to respectfully request a one business day adjournment – to Monday, March 19 – of the time for Messrs. Archer and Cooney to file their sur-reply with respect to the government’s motion to invoke the crime-fraud exception. The reason for this extension, in addition to the general press of trial preparation, is that I have had to devote a significant amount of time over the past week, including out-of-town travel on two occasions (and at this moment), to deal with a material and unexpected development in another investigation. In addition, as the Court is aware, the government on Friday expanded the scope of their crime-fraud application to certain additional documents [ECF No. 338], which must be incorporated into the sur-reply.

I contacted the government yesterday evening to determine whether it consented to this request, but have not yet heard back. Thank you for your consideration of this request.

Respectfully,

/s/ Matthew L. Schwartz  
Matthew L. Schwartz